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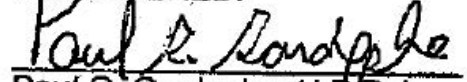
**VIA ECF**

The Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
40 Foley Street, Room 2101  
New York, New York 10007

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** May 20, 2021

**Re: Consent Motion for Consolidation of Related Cases  
Savino Del Bene U.S.A., Inc. v. Mediterranean Shipping Company, S.A. et al.  
Case No. 1:21-cv-1524-JPO  
Related Case Caption: Curava Corp. v. Savino Del Bene U.S.A., Inc. et al.  
Related Case No. 1:21-cv-01457-PGG**

Dear Judge Oetken,

We represent Plaintiff, Savino Del Bene U.S.A., Inc. (hereinafter "Plaintiff" and/or "SDB"), in the above-referenced case. Pursuant to Your Honor's Individual Practices ¶ I(A) and Federal Rule of Civil Procedure 42(a), this letter-motion is submitted jointly along with counsel for Defendant, Curava Corporation ("Curava"). Further, counsel for Plaintiff (Curava) and Defendant in the Related Case (1:21-cv-01457-PGG) consent to the relief requested herein.

Pursuant to Federal Rule of Civil Procedure 42(a), counsel for Plaintiff and Defendant respectfully request to consolidate the instant matter with the Related Case pending before the Southern District of New York and captioned *Curava Corp. v. Savino Del Bene U.S.A., Inc. et al*, Case No.: 1:21-cv-01457-PGG. The subject actions both arise from alleged damages concerning the international ocean movement of goods from from China to the United States during or around January 2020. (See [D.E. 1] at ¶ 12 and Related Case [D.E. 1] at ¶ 11). Further, the complaints in these actions relate to the same underlying events and assert the same or substantially the same claims, including the Carriage of Goods by Sea Act ("COGSA").

Based on the foregoing, counsel for SDB and Curava respectfully submit that a consolidation of the actions with serve the interests of judicial economy.

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Should Your Honor have any questions regarding the foregoing, please do not hesitate to contact our office. Thank you for your consideration in this matter.

Respectfully submitted,

SPECTOR RUBIN, P.A.

*Andrew Spector*

Andrew R. Spector

cc: All Counsel of Record (via *ECF*)